11-30-07 C33389 \$35 UNITED STATES DISTRICT COURT Southern District of New York OLD TOLEDO BRANDS, INC.,

Plaintiff,

07 Civ. 9496 (VM)(GWG)

-against-

SCHENKER, INC., d/b/a

NOTICE OF MOTION TO ADMIT ATTORNEY PRO HAC VICE

Sea Cargo International,

Defendant.

PLEASE TAKE NOTICE, that upon the annexed Affirmation Support of Motion to Admit Attorney Pro Hac Vice of Sandra Gale Behrle, dated November 5, 2007, the Affirmation of Brendan Collins, dated November 2, 2007, and the Certificate of the United States District Court for the District of Columbia, plaintiff Old Toledo Brands, Inc., by its attorneys Cooper, Brown & Behrle, P.C., will move this Court for an Order pursuant to Local Civil Rule 1.3(c) admitting Brendan Collins, Esq., as attorney, pro hac vice.

Dated: New York, New York November 14, 2007

COOPER, BROWN & BEHRLE, P.C.

Sándra Gal∉ Behrl⁄e (4652)

Attorneys for Plaintiff

331 Madison Avenue, 2nd Floor

New York, New York 10017 Telephone: (212) 957-9000 TO:

John T. Lillis, Esq. Kennedy Lillis Schmidt & English 75 Maiden Lane, Suite 402 New York, New York 10038-4816 UNITED STATES DISTRICT COURT Southern District of New York OLD TOLEDO BRANDS, INC.,

Plaintiff,

07 Civ. 9496 (VM) (GWG)

AFFIRMATION IN SUPPORT

: OF MOTION TO ADMIT

SCHENKER, INC., d/b/a

PRO HAC VICE

Sea Cargo International,

-against-

Defendant. :

Sandra Gale Behrle, an attorney admitted to practice before the courts of the State of New York, affirms under penalties of perjury and states:

- I am an officer of Cooper, Brown & Behrle, P.C., attorneys of record for Plaintiff. I am attorney admitted to practice before the Courts of this state since June 1974, First Department.
- I make this motion on my own knowledge for an Order admitting my colleague, Brendan Collins, Esq., to appear as attorney for plaintiff in the above-captioned action, pro hac vice.
- 3. As shown by the accompanying Affirmation of attorney Collins, he is a member in good standing before the Bars of the District of Columbia and the District of Maryland.

4. I will continue my appearance as co-counsel for plaintiff in this matter.

WHEREFORE, movant respectfully requests an Order of this Court admitting Brendan Collins, Esq., to practice before this Court, pro hac vice.

Dated: New York, New York

November 5, 2007

Sandra Gale Behrle (4652)

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

OLD TOLEDO BRANDS, INC.,

Plaintiff,

Civil Action No. 07 Civ. 9496

v.

SCHENKER, INC., d/b/a Sea Cargo International,

Defendant.

<u>AFFIRMATION</u>

Brendan Collins affirms and states:

- 1. I am a partner in the law firm of Galland Kharasch Greenberg Fellman & Swirsky, PC, attorneys for plaintiff Old Toledo Brands, Inc. in the above-referenced litigation. I make this affirmation to support the motion for my admission *pro hac vice*.
- 2. The law firm of Galland Kharasch Greenberg Fellman & Swirsky, PC, whose principal place of business is 1054 Thirty-First Street, NW, Washington, DC, 20007, has a local, regional and international practice and is regular counsel to plaintiff Old Toledo Brands, Inc.
- 3. I am a graduate of George Washington University School of Law. I am a member of the Maryland Bar (admitted 1986) and the District of Columbia Bar (#413658, admitted 1988). I am admitted to the following courts: U.S.D.C. for the District of Columbia (admitted 08/05/91), U.S.D.C. for the District of Maryland (Southern District) (Fed. Bar No. 17065, admitted 07/09/07), 5th Circuit Court of Appeals (admitted 12/18/98), and 10th Circuit Court of Appeals (admitted 09/09/97). There are no disciplinary proceedings filed or pending against me in any jurisdiction. Attached hereto is a certificate issued by the Clerk of the United States District Court for the District

of Columbia certifying that I am a member of that Bar in good standing.

Based on the foregoing, it is respectfully requested that the Court permit my pro hac 4. vice admission.

Dated: November 2, 2007

enter Colle Brendan Collins

GALLAND KHARASCH GREENBERG

FELLMAN & SWIRSKY, PC 1054 Thirty-First Street, NW

Washington, DC 20007

Telephone: Facsimile:

202/342-5200 202/342-5219

Email:

bcollins@gkglaw.com

Counsel for Plaintiff

OLD TOLEDO BRANDS, INC.

UNITED STATES DISTRICT COURT
Southern District of New York

OLD TOLEDO BRANDS, INC.,

Plaintiff,

07 Civ. 9496 (VM)(GWG)

-against-

FILING OF CERTIFICATE
OF GOOD STANDING

SCHENKER, INC., d/b/a

Sea Cargo International,

Defendant. :

To the Clerk of the Court:

Pursuant to Local Civil Rule 1.3(c), filed herewith is a good standing certificate from the District of Columbia Court of Appeals for Brendan Collins, Esq.

Dated: New York, New York November 14, 2007

COOPER, BROWN & BEHRLE, P.C.

By: Sandra Gale Behrle (4652)

Attorneys for Plaintiff Old Toledo Brands, Inc.

331 Madison Avenue

New York, New York 10017 Telephone: (212) 957-9000 Telefax: (212) 843-9191

United States District Court for the District of Columbia CLERK'S OFFICE 333 Constitution Avenue, NW Washington, DC 20001

I, NANCY M. MAYER-WHITTINGTON, Clerk of the United States

District Court for the District of Columbia, do hereby certify that:

BRENDAN COLLINS

was, on the 5th day of August A.D. 1991 admitted to practice as an Attorney at Law at the Bar of this Court, and is, according to the records of this Court, a member of said Bar in good standing.

In Testimony Whereof, I hereunto subscribe my name and affix the seal of said Court in the City of Washington this <u>25th</u> day of <u>October</u> A.D. 2007.

NANCY M. MAYER-WHITTINGTON, CLERK

By:

Deputy Clerk

:

:

UNITED STATES DISTRICT COURT
Southern District of New York
-----OLD TOLEDO BRANDS, INC.,

Plaintiff,

07 Civ. 9496 (VM)(GWG)

-against-

ORDER ADMITTING

againsc

ATTORNEY PRO HAC VICE

SCHENKER, INC., d/b/a Sea Cargo International,

Defendant. :

- - - - - - x

UPON the reading and filing of the Affirmation in Support of Motion to Admit Attorney Pro Hac Vice of Sandra Gale Behrle, dated November 5, 2007, the Affirmation of Brendan Collins, dated November 2, 2007, and the filing of the Certificate of Good Standing of Brendan Collins from the District of Columbia Court of Appeals, dated October 25, 2007, it is hereby

ORDERED, that Brendan Collins, a member in good standing of the Bars of the District of Columbia and District of Maryland, be and hereby is admitted to this Court, pro hac vice, pursuant to Local Civil Rule 1.3(c).

Dated: New York, New York
November , 2007

ENTER:

United States District Judge

Certificate of Service

I hereby certify that on the 14th day of November, 2007, I caused to be mailed a true copy of the within Notice of Motion to Admit Attorney Pro Hac Vice, via first class mail, addressed as follows:

John T. Lillis, Esq. Kennedy Lillis Schmidt & English Attorneys for Defendant 75 Maiden Lane, Suite 402 New York, New York 10038-4816

Sandra Gale Behrle (4652)